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# SWIDLER BERLIN SHEREFF FRIEDMAN, LLP

WASHINGTON OFFICE
3000 K STREET, NW, SUITE 300
WASHINGTON, DC 20007-5116
TELEPHONE (202) 424-7500
FACSIMILE (202) 424-7647

NEW YORK OFFICE
919 THIRD AVENUE
NEW YORK, NY 10022-9998
TELEPHONE (212) 758-9500
FACSIMILE (212) 758-9526

July 30, 1999



**VIA HAND DELIVERY**

Magalie Roman Salas
Secretary
Federal Communications Commission
The Portals - TW-A325
445 Twelfth Street, S.W.
Washington, DC 20554

Re: Ex Parte UNE Remand Proceeding CC Docket No. 96-98

Dear Ms. Salas:

CoreComm Limited ("CoreComm"), pursuant to Sections 1.1206(b) of the Commission's rules, 47 C.F.R. Section 1.1206(b), by undersigned counsel, submits the following information in the above-captioned proceeding.

CoreComm is a full-service telecommunications company which, through its wholly owned subsidiaries, is currently providing competitive local exchange and other telecommunications services to residential and business customers in all five Ameritech states as well as New York, Massachusetts, New Hampshire and other states in the Bell Atlantic region. Although the company is currently serving customers on a resale basis, it is in the process of securing collocation space, deploying facilities and seeking access to unbundled network elements from incumbent LECs under its Smart LEC network build strategy. Accordingly, CoreComm has a substantial interest in the outcome of this proceeding.

CoreComm urges the Commission to promote the development of competition as envisioned by the 1996 Telecommunications Act by designating various elements of the local loop, *i.e.*, subloops, as network elements subject to the unbundling requirements of the Act. CoreComm believes that the record in this proceeding fully establishes that sub-loop elements meet the "necessary" and "impair" standards of Section 251(d)(2) of the Act.[1] CoreComm also believes that the record contains ample evidence that sub-loop unbundling is technically feasible. It is not surprising, however, that incumbent LECs have asserted that sub-loop unbundling is not

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[1] *See e.g.* MCI WorldCom at 45-46; Northpoint at 16 -18; ICC at 11; TX PSC at 15-16; WUTC at 3-4, 14, 17.

technically feasible and, if mandated, would raise a host of concerns affecting the integrity of the public switched network.[2] Indeed, these arguments are strikingly similar to those that the incumbent LECs made in an effort to thwart collocation requirements, which ultimately proved to be meritless. No different conclusion should be reached here.

Contrary to the claims made by those opposing sub-loop unbundling, loops are typically comprised of segments which are joined together at various points that present natural junctures for interconnection and, indeed, are already used by incumbent LECs themselves for that very purpose. Making the simple cross-connections between those various sub-loop elements does not require any special training or skills beyond those already possessed by incumbent and competitive LEC service technicians. Accordingly, CoreComm submits that there is no substantial risk of network harm from permitting direct access by competitive LECs to sub-loop elements. In the alternative, the Commission could mandate sub-loop unbundling with the proviso that any necessary cross-connections be made by the incumbent LEC upon appropriate TELRIC charges. This is a less desirable alternative, however, because it would force competitors to remain dependent upon the incumbent LEC for prompt, efficient and cost effective engineering services.

In addition to the sub-loop elements advocated by other parties in this proceeding,[3] CoreComm urges the Commission to designate incumbent LEC feeder and distribution plant as separate sub-loop elements, with access mandated at the points discussed below.

Feeder Distribution Interface ("FDI"). The FDI was designed for the purpose of facilitating connections between feeder and distribution plant, which is how they are used by incumbent LECs today. FDIs usually have excess space to permit additional connections by third parties because incumbent LECs have generally planned for growth in the network. To the extent there is no space, it is a simple matter to install an adjacent FDI structure to accommodate new connections. As to the complexity of wire connections themselves, this too is a relatively simple matter. The connections made at FDIs are typically simple wire connections made by means of connector blocks that require only basic levels of training in order to be competently installed. In some cases, the FDI will be installed or housed in a Controlled Environmental Vault ("CEV"). The fact that an FDI is installed in a CEV is essentially irrelevant to the technical feasibility of accessing sub-loop elements at that point. It is technically feasible to make connections at the FDI whether the FDI is installed in a CEV or elsewhere. Accordingly, the Commission should require that access to sub-loop elements be permitted in situations where the FDI is located in a CEV.

Digital Loop Carrier System. Competitive LECs should also be able to access the loop at either end of any DLC installed in the loop. This would allow competitive LECs to bypass the incumbent LEC DLC and still maintain connectivity from the CO to the end-user customer, thus removing a major impediment to the provision of universal advanced

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[2] SBC Comments. p. 30-31.

[3] *See e.g.* Northpoint at 17-18.

services. DLCs are frequently housed in CEVs. As explained, CEVs do not make it technically infeasible to access sub-loop elements housed in them.

The attached Figures 1-8 illustrate various loop configurations. Figures 1 and 2 show typical current incumbent LEC loop configurations with and without active loop electronics. Figures 3-8 show various service arrangements that could be implemented by competitive LECs if feeder and distribution plant were designated as UNEs.

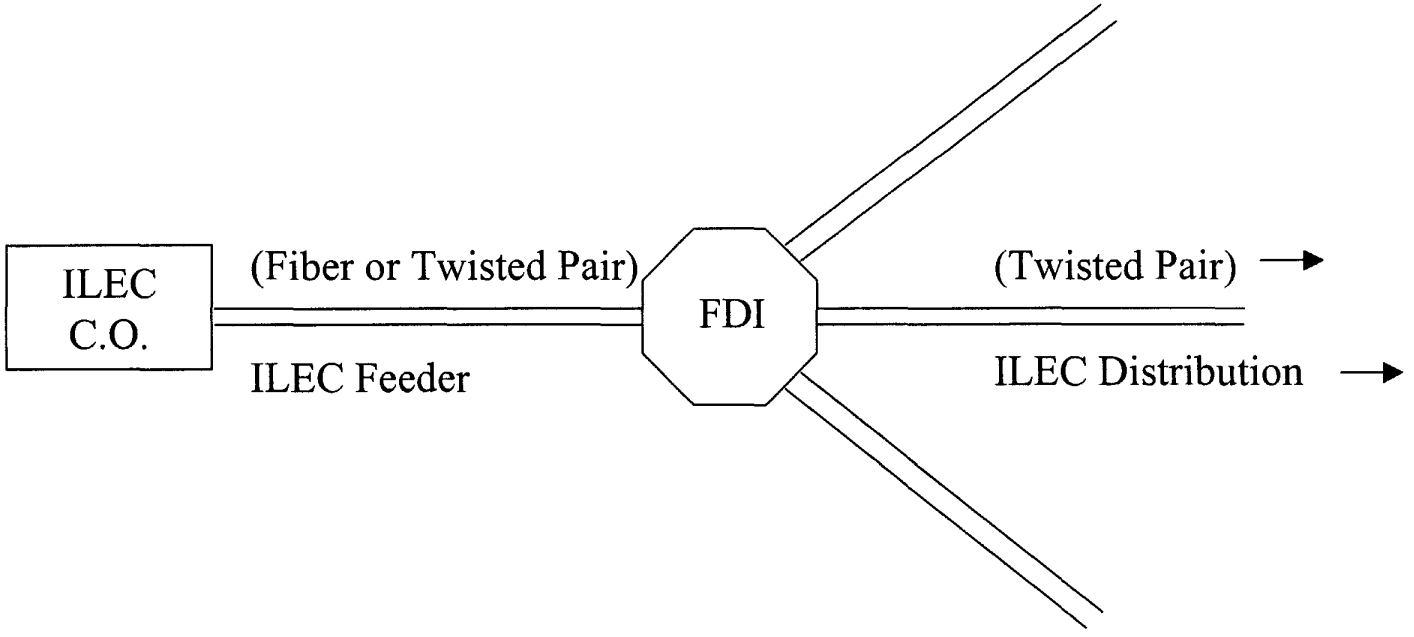
Two copies of this letter are enclosed.

Sincerely,

Patrick J. Donovan
Counsel for CoreComm Ltd.

cc: Jake Jennings
Claudia Fox
John Reel
Sanford Williams
Jonathan Askin

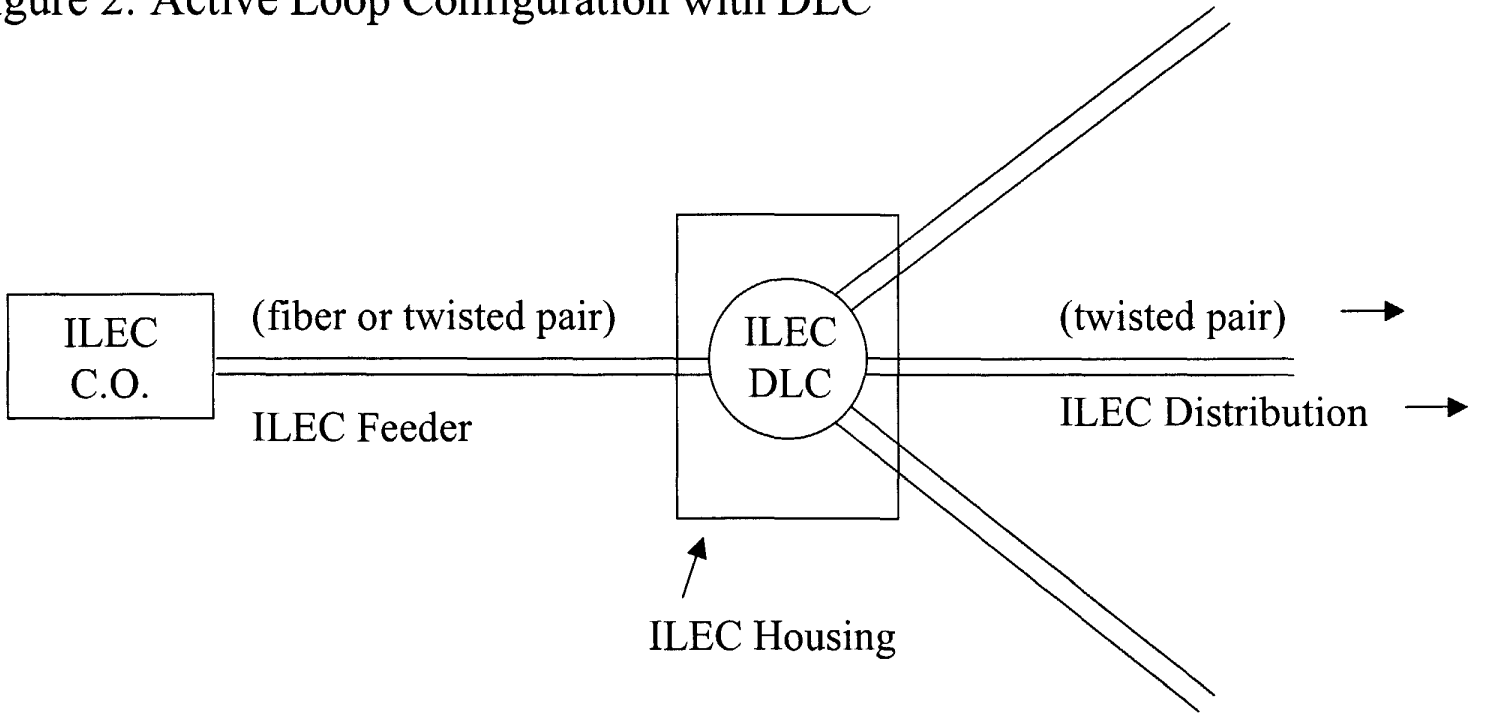
Figure 1: Passive Loop Configuration




- The Feeder Distribution Interface ("FDI") is a passive cross connection device.

- The physical housing of the FDI can take a variety of forms, including any of the following:
  1) Cabinets on the Ground;
  2) Pole Mounted Cabinets;
  3) Sealed Enclosure, Strand or Pole Mounted, or Underground Chamber;
  4) Controlled Environmental Vaults.

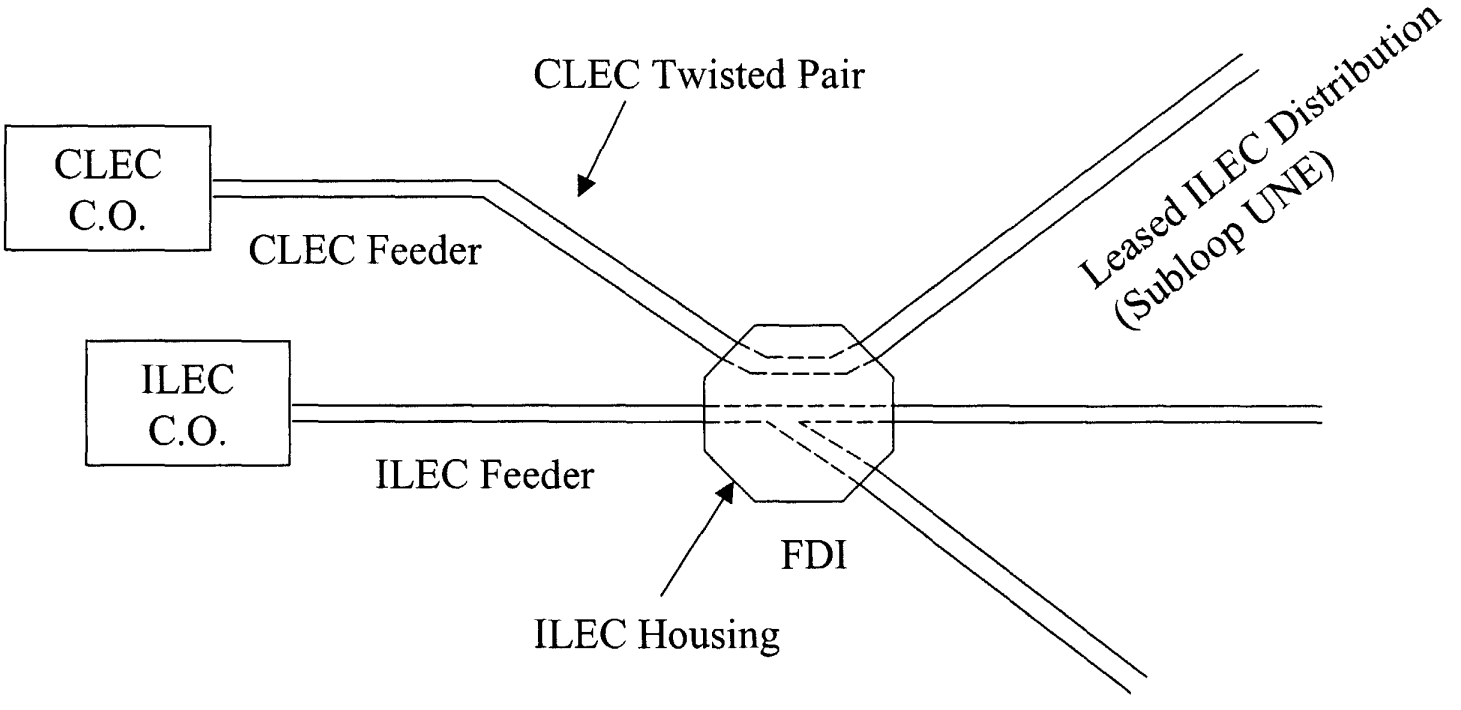
Figure 2: Active Loop Configuration with DLC




- Digital Loop Carrier ("DLC") is an active electronic device which multiplexes and concentrates individual analog or digital traffic from each subscriber line into a high speed digital stream transported over fiber, twisted pair or other media ("TP").

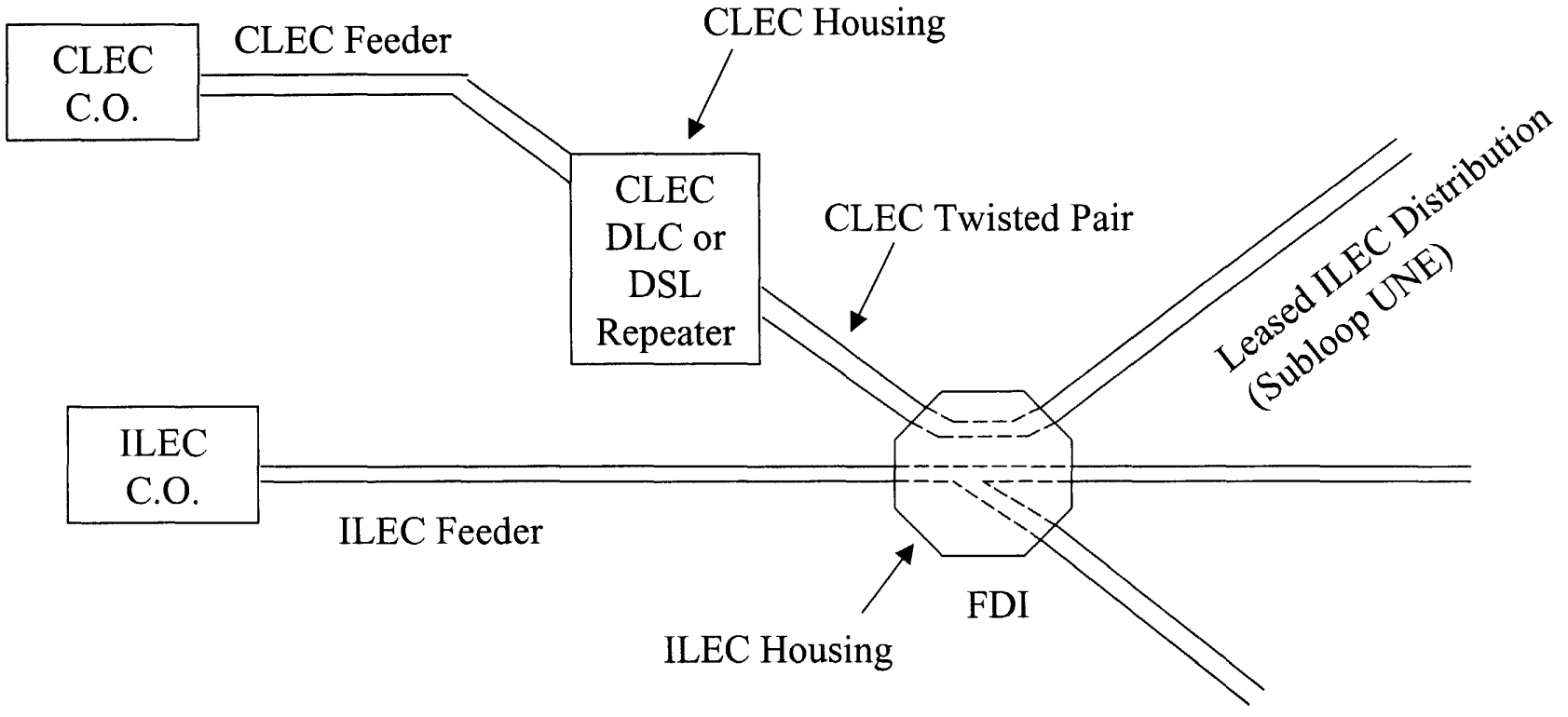
- The physical housing for the DLC can take a variety of forms, including:
  1) Pole or Ground Mounted Cabinets;
  2) Controlled Environmental Vaults.

Figure 3: Passive Loop Configuration CLEC Provided Feeder and Leased ILEC Distribution (Subloop UNE)



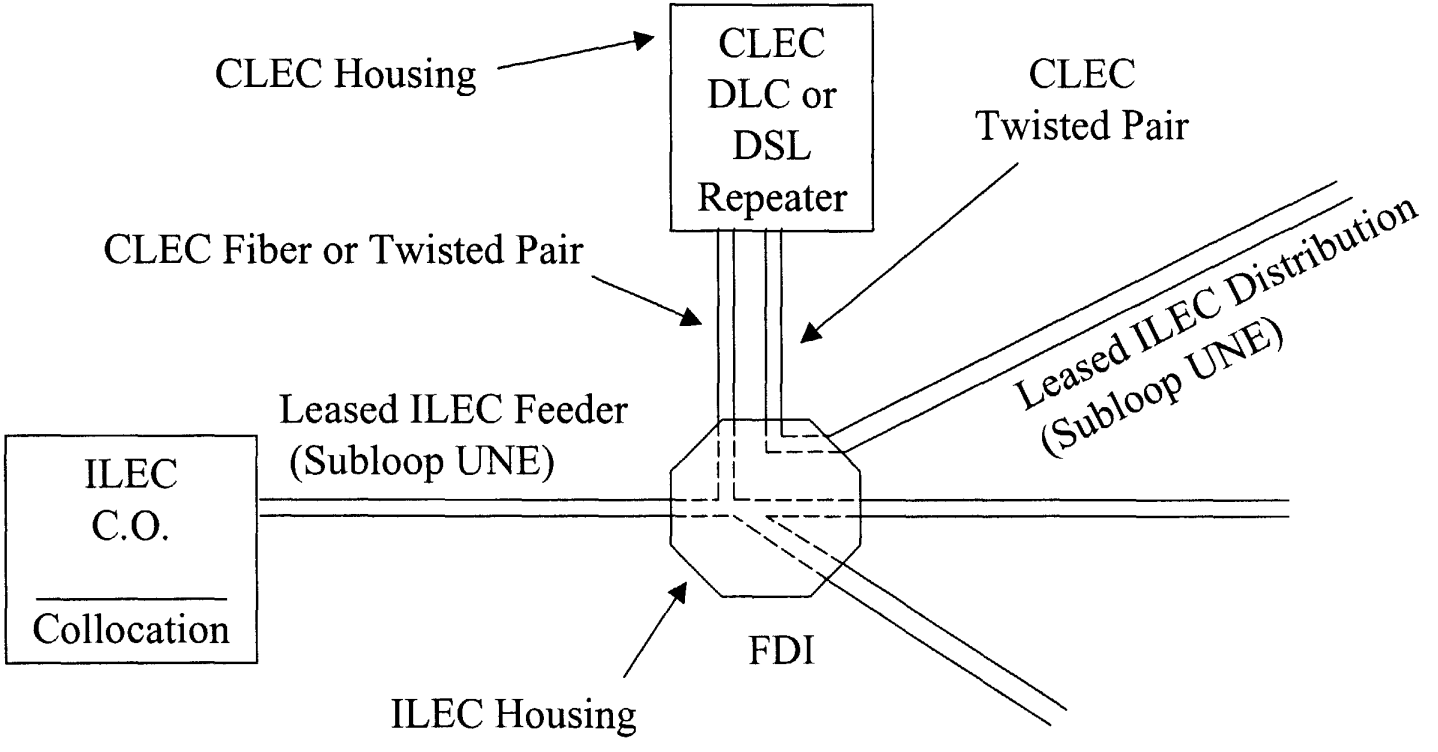

- CLEC Feeder connected to ILEC distribution at FDI through simple cross-connection (e.g., punch block).

Figure 4: Passive Loop Configuration: CLEC Provided Feeder & DLC or DSL Repeater Plus Leased ILEC Distribution (Subloop UNE)




- CLEC provided feeder runs to CLEC provided DLC or DSL repeater placed in nearby housing. CLEC twisted pair runs from CLEC housing and connected to ILEC distribution at FDI through simple cross-connection (e.g., punch block).

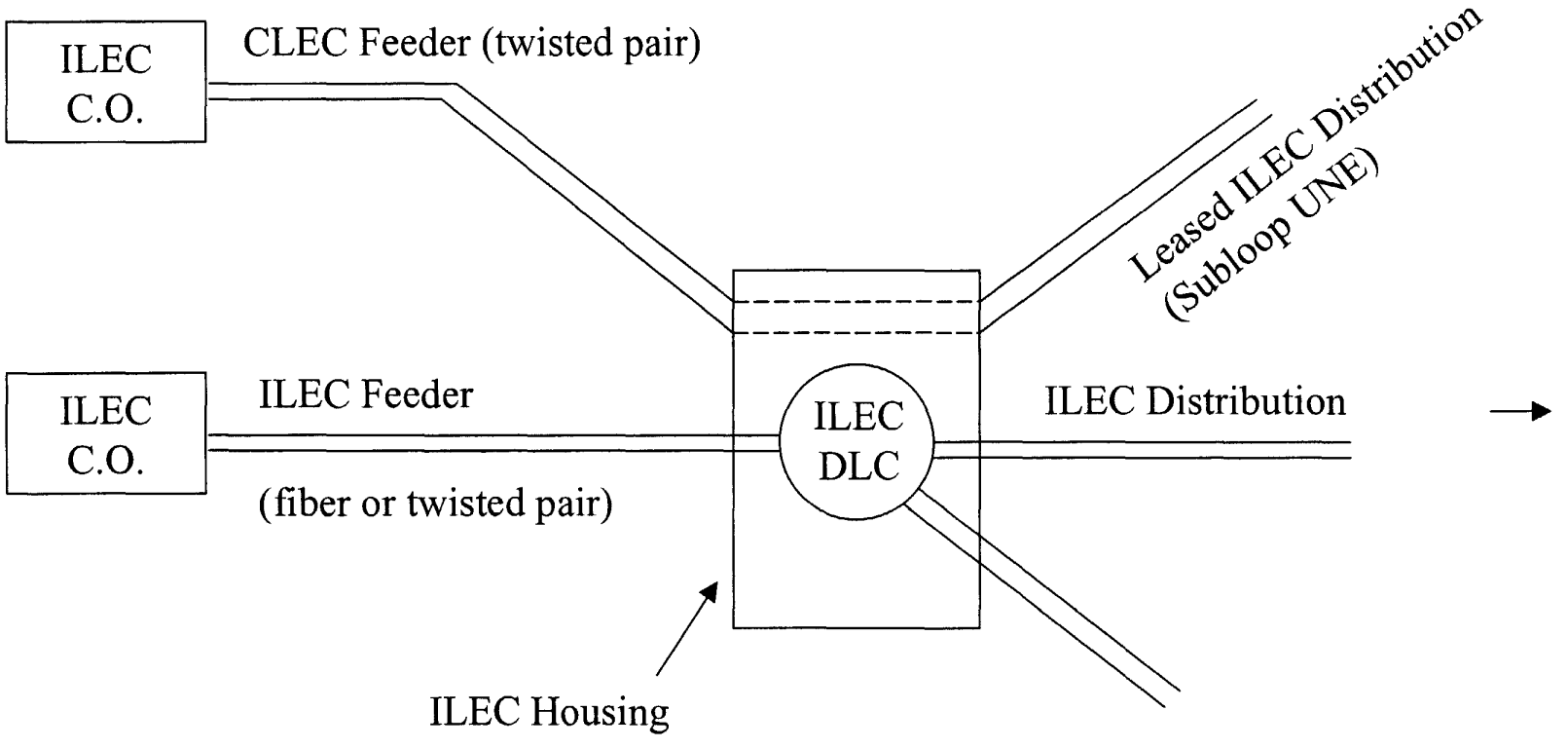
Figure 5: Passive Loop Configuration: CLEC Provided DLC or DSL repeater plus Leased ILEC Distribution (Subloop UNE) and Leased ILEC Feeder (Subloop UNE)




- ILEC Feeder connected to CLEC fiber or twisted pair via cross-connection at FDI (e.g., optical connector, punch block, etc.)

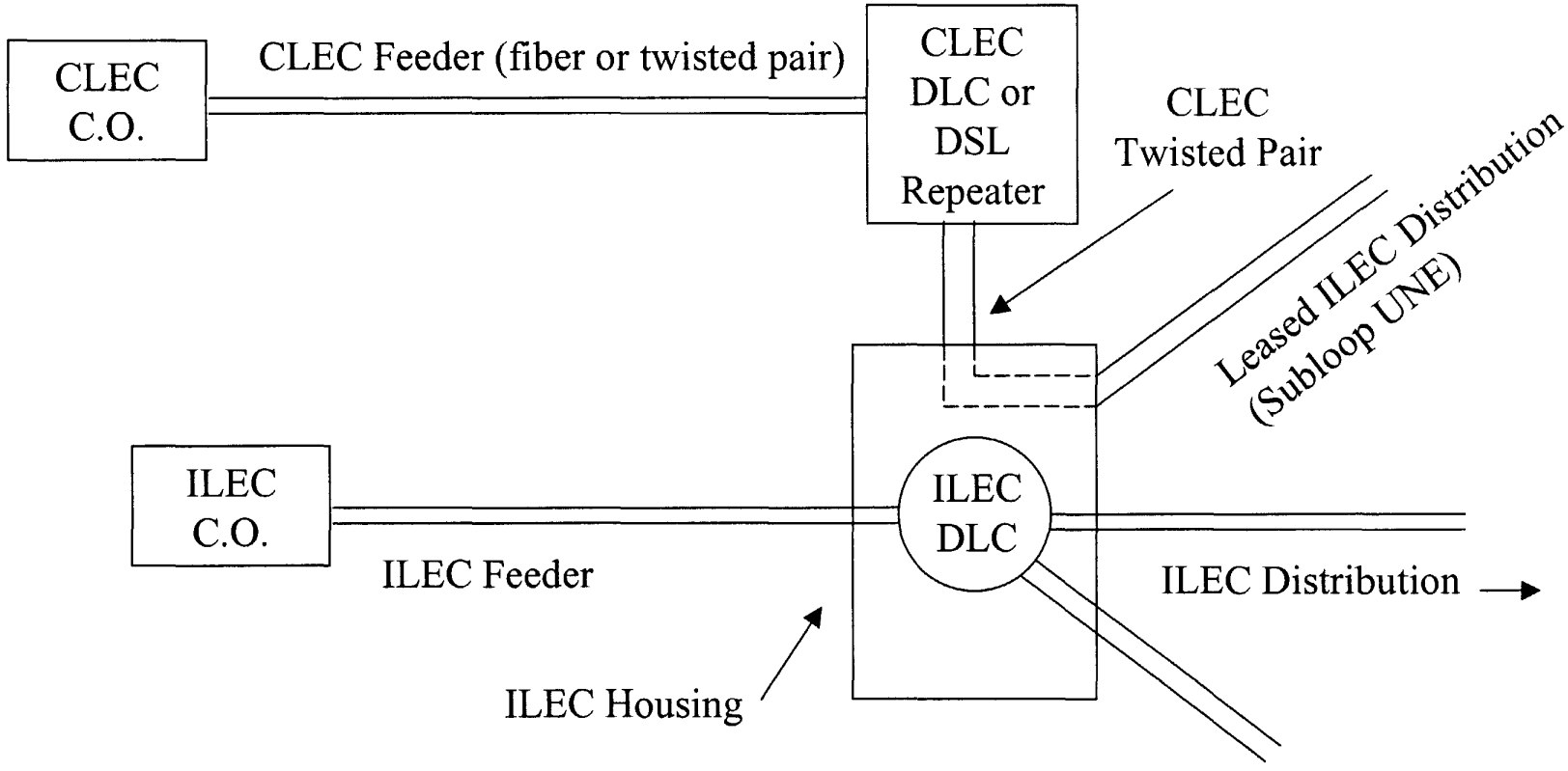
- CLEC twisted pair from CLEC DLC or DSL repeater connected to ILEC distribution at FDI via simple cross connection (e.g., punch block).

Figure 6: Active Loop Configuration: CLEC Provided Feeder plus Leased ILEC Distribution (Subloop UNE) to bypass ILEC DLC



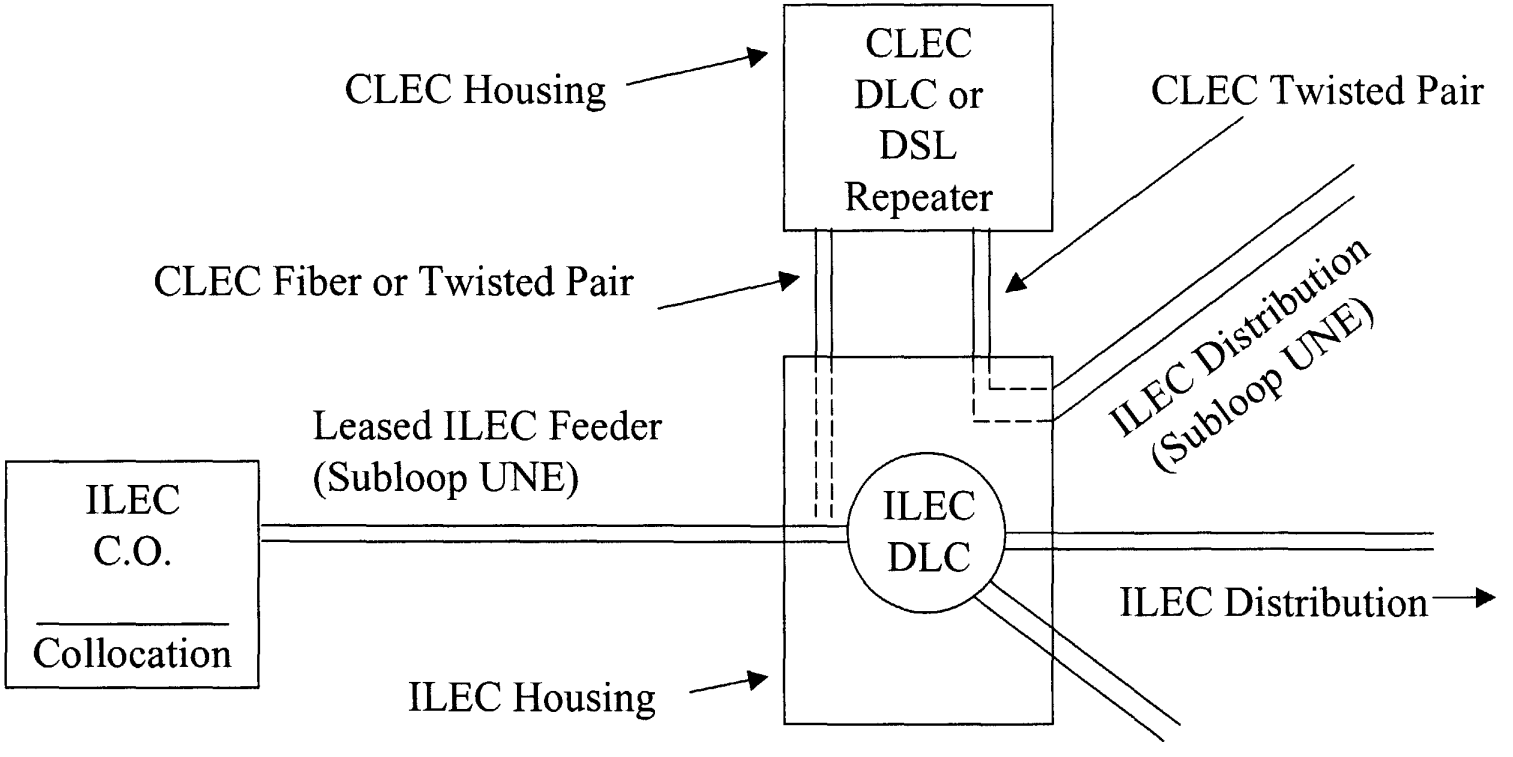

- CLEC Feeder connected to ILEC distribution at FDI, bypassing ILEC DLC, through simple cross-connection (e.g., punch block).

Figure 7: Active Loop Configuration: CLEC Provided Feeder and DLC or DSL Repeater Plus Leased ILEC Distribution ( Subloop UNE)




- CLEC Feeder connected to CLEC DLC or DSL repeater, located in nearby housing.
- CLEC twisted pair from CLEC DLC or DSL repeater connected to ILEC distribution at FDI, bypassing ILEC DLC, through simple cross-connection (e.g., punch block).

Figure 8: Active Loop Configuration: CLEC Provided DLC or DSL Repeater Plus Leased ILEC Distribution (Subloop UNE) and Leased ILEC Feeder (Subloop UNE)




• Leased ILEC Feeder (Subloop UNE) connected to CLEC 's fiber or twisted pair via cross connection at ILEC DLC (e.g., optical connector, punch block, etc.).

•CLEC twisted pair from CLEC DLC or DSL repeater connected to Leased ILEC distribution (subloop UNE) at ILEC Housing via simple cross-connection (e.g., punch block).